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August 10, 2009

Honorable Marilyn D. Go
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Curulli v. NYCDOE
08 CV 4525 (ENV) (MDG)**

Dear Judge Go:

This office represents the plaintiff in the above referenced matter. Plaintiff apologizes to the Court and Corporation Counsel for having to seek Court intervention.

Plaintiff has now responded to the outstanding discovery requests by defendant on August 8, 2009 via fax.

The reason for the delay was a confluence of work due to the time of the year (the end of the school year) regarding a number of matters. Plaintiff's counsel has had a number of special education cases in the last forty-five days involving five or more cases that have gone to an impartial hearing involving multiple days of hearing. These cases under IDEA involve special education services for disabled children are complex, requiring extensive preparation, frequently requiring medical testimony and should have the highest priority. Plaintiff just completed a post hearing brief on a four day trial and has a second post hearing brief due on August 14, 2009 on another four day trial on a special education case and has just completed two summary judgment responses in federal court involving IDEA. In addition, plaintiff has an appellate reply brief due by August 17, 2009. In addition, the undersigned has had numerous other commitments.

I again regret any inconvenience this has caused the Court and Corporation Counsel and request that the discovery deadline be extended to September 4, 2009 to complete depositions in the case.

Very truly yours,

S/Stewart Lee Karlin
Stewart Lee Karlin

SLK:nm

cc: Rebecca Rachel Hirschklau, Ass't Corporation Counsel
via ECF